

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352 0039151

OCT 25 1994

Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
I315 W. Fourth Avenue
Kennewick, Washington 99336-6018 ____



Dear Mr. Alexander:

TRANSMITTAL OF THE PHASE II SAMPLING ACTIVITIES SCHEDULE FOR 100-D PONDS, D-1-1

This letter transmits the subject schedule for your review. This fulfills the commitment made in the U.S. Department of Energy's (DOE's) letter dated October 7, 1994, and accepted in your October 12, 1994, letter as adequate to comply with the Notice of Violation requirements.

As stated in the letter, the schedule includes completion of a sampling and analysis plan, sampling, sample analyses, and evaluation of the data. Transmittal of the data to the State of Washington Department of Ecology (Ecology) will take place after validation of the data is complete. The evaluation of the data will be transmitted as a part of the revised closure plan.

DOE, in working with your staff, has made every effort to expedite this schedule to meet a January 9, 1994, target sampling date. However, due to sampling limitations during the winter months (November 1994 through March 1995), DOE will conduct sampling activities on an expedited basis, a soon as weather permits, after the January 9, 1994, target date.

Other critical path dates on this schedule are completion of the data quality planning by October 31, 1994, and receipt of Ecology's comments on the Sampling and Analysis Plan by December 30, 1994. Slippage of these dates will impact the January 9, 1994, target sampling date. Additionally, Ecology comments on the Notice of Deficiency responses may impact this schedule.

DOE requests that Ecology address the priority, consistency of regulatory requirements, and coordination of the 100-D Pond Closure with the 100-D Area Comprehensive Environmental Response and Liability Act activities currently underway. Specifically, DOE would propose that this unit be folded into the Proposed Plan for Interim Remedial Measure at the 100-DR-1 Operable Unit, which is currently under Ecology review, as a liquid waste disposal site. Consistent with the phased approach being taken in this proposed plan, this unit would be addressed as part of the first phase. Coordination of these

efforts would be cost effective, accelerate the cleanup of this unit, and provide a consistent cleanup standard throughout the 100 Area.

If you have any questions, please contact Ms. N. A. Werdel at 376-5500.

Sincerely,

Julie K. Erickson, Director

River Sites Restoration Division

RSD: NAW

Attachment

cc w/attach:

A. Huckaby, Ecology

K. Oates, ÉPA

D. Sherwood, EPA

R. Wilson, Ecology

cc w/o attach:

G. R. Eidam, BHI

J. G. Woolard, BHI

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Activity Description	Orig Duf	Rem Dur	*	Early Start	Early Finish	ÇŢ	I NOV	DEC	JAN	₩ #:₩		XAPA	MAY	JUN	995 1 JUL	AUG	SEP	OCT	
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Write SAP	15	15	Ō	01NOV94	21NOV94														
Internal /DOE Review	10	10	0	22NOV94	07DEC94		X	Ţ		i !									
Comment Incorporation / Relssue	5	5	0	08DEC94	14DEC94			ASSET											
Ecology Review	10	10	Õ	14DEC94	29DEC94			*****											
Comment Incorporation / Reissue	5	5	Ō	30DEC94	06JAN95				37										
Sampling	4	4	0	09JAN95	12JAN95				▲¥ 24Da	ys conti	ngency fo	r weath	er/schedu	ling delay					
Analytical Work	33	33	0	16FEB95	04APR95							7		ļ				i	
Data Validation	15	15	0	05APR95	25APR95					,		800000							
Data Handling / Validation Review	7	7	0	26APR95	04MAY95					1		}						1	
Data Evaluation Report	22	22	0	05MAY95	05JUN95									92 NJ	i				
Closure Plan	1	l												-				1.	
Ecology Issue NODs	Ó	0	Ó	Ì	03JAN95*				Î						,				
Workshops to Resolve Issues	128	128	Ō	04JAN95	05JUL95										1				
Revise and Submit Closure Plans	66	66	0	06JUL95	05OCT95														
Ecology Review	44	44	0	06OCT95	06DEC95	$\left\{ \ \right\}$												*******	

See attached sheet for assumptions

							
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Project Fireign	DEDECOS	American Ir	Bechtel Hanford, Inc.	G-8-5	Revision	Limens	144
Date Date	210CT94	_	100-Area Remedial Actions	I I			
Plat Date	24OCT94						
(c) Primerore Systems	, Inc.		D-Ponds Sampling and Closure Plan				